

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

DEFENSE DISTRIBUTED, §  
Plaintiff §  
§  
v. § Civil Action No. 4:22-cv-00691-O  
PAMELA BONDI in her Official §  
Capacity as Attorney General of the §  
United States, *et al.*, §  
§  
Defendants. §  
§

**Defense Distributed's Motion for a Preliminary Injunction**

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Defense Distributed moves for an order preliminarily enjoining the Defendants from enforcing the challenged redefinition of "firearm" in 27 C.F.R. §§ 478.11 and 27 C.F.R. §§ 478.12, *see* Definition of "Frame or Receiver" and Identification of Firearms, 87 Fed. Reg. 24,652 (Apr. 26, 2022), against Defense Distributed vis-à-vis the following items:

1. The Polymer80 80% Frame as sold by Defense Distributed on ghostgunner.com before the Rule took effect.
2. The M1911 80% Frame:45ACP as sold by Defense Distributed on ghostgunner.com before the Rule took effect.
3. The M1911 80% Frame:9mm/10mm/.8 Super/.40 S&W as sold by Defense Distributed on ghostgunner.com before the Rule took effect.
4. The G80 Build Kit as sold by Defense Distributed on G80.com.
5. The G80 Unfinished Receiver as sold by Defense Distributed on G80.com.
6. The G80 Grip Module as sold by Defense Distributed on G80.com.

A brief and evidence support this motion. The motion is opposed.

Respectfully submitted,

By /s/ Chad Flores

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Counsel for Defense Distributed

**Certificate of Conference**

Defendants oppose this motion. Counsel for Defense Distributed confirmed that by conferring via email with counsel for the Defendants.

/s/ Chad Flores  
Chad Flores

**Certificate of Service**

A true and correct copy of the foregoing document was served via the Court's CM/ECF system to all counsel of record on the day of its filing.

/s/ Chad Flores  
Chad Flores